

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WESTERN TEXAS
MIDLAND-ODESSA DIVISION**

JENNIFER VETRANO,

Plaintiff,

v.

JOHN BRDA,
ALLISON CHRISTILAW, MBA, ICD.D B,
JOHN R. HARDING, UZI SASSON,
DAN EATON ESQ, MAURICE GUITTON,
ERIC M. LESLIE, PHILIPPE MORALI,
KEN HANNAH, STEEN KARSBO,
JOHN DOES 1-20, JANE DOES 1-20

Defendants.

Case No.: 7:24-CV-00325-DC-RCG

FILED

MAR 31 2025

CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
BY DEPUTY

MOTION FOR DEFAULT JUDGMENT

TO THE HONORABLE JUDGE RONALD C. GRIFFIN and JUDGE DAVID COUNTS:

Plaintiff, Jennifer Vetrano, respectfully requests the entry of a default judgment against Uzi Sasson, the Defendant in the above-captioned case. In support of this Motion, Plaintiff states as follows:

I. BACKGROUND

Plaintiff filed the Complaint against Defendant on December 27, 2024. Defendant was properly served with the Summons and Complaint on February 26, 2025, as evidenced by the Return of Service filed with this Court on the same date. The defendant was required to file an Answer or otherwise respond by March 19, 2025, in accordance with the Federal Rules of Civil

Procedure. Defendant failed to file a timely answer or other responsive pleading within the time required by Federal Rule of Civil Procedure 12(a).

Defendant failed to respond timely. Instead, Defendant filed an untimely and procedurally deficient Motion to Dismiss on March 20, 2025, without obtaining an extension from Plaintiff or the Court. More than 21 days have elapsed since Defendant was served with the Complaint, and Defendant has not filed an answer or other responsive pleading. The Clerk of Court entered a Clerk's Entry of Default against Defendant on March 20, 2025.

II. ARGUMENT

Federal Rule of Civil Procedure 55(a) states that default occurs when a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party's default. The Fifth Circuit has established that a default judgment is essentially a judgment on the merits that conclusively establish the defendant's liability. *Nishimatsu Constr. Co., Ltd. v. Houston Nat. Bank*, 515 F.2d 1200, 1206 (5th Cir. 1975).

As set forth above, the Defendant has failed to file a timely answer or other responsive pleading, and the Clerk of Court has entered a Clerk's Entry of Default against Defendant. Accordingly, Plaintiff is entitled to a default judgment against Defendant.

III. CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that the Court enter a default judgment against Defendant Uzi Sasson. I hereby request a hearing.

Respectfully submitted,

/s/ Jennifer Vetrano

Jennifer Vetrano, Pro Se

25 Pond Hollow Lane

West Creek, NJ 08092

Phone: 908-783-0105

Email: Jvetrano999@gmail.com

A copy of the foregoing has been emailed to Defendant's lawyer John Hardin via email

JohnHardin@perkinscoie.com on 3/28/2025

/s/ Jennifer Vetrano Jennifer Vetrano, Pro Se

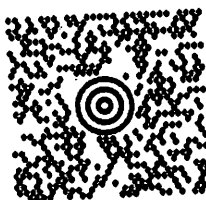
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